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December 11, 2001

File No: 46001.000278

**By Hand Delivery**

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
Capitol Heights Facility  
9300 East Hampton Drive  
Capitol Heights, MD 20743

***WorldCom, Cox, and AT&T ads. Verizon***  
**CC Docket Nos. 00-218, 00-249, and 00-251**

Dear Ms. Salas:

Enclosed please find four copies of Verizon VA's Post-Hearing Reply Brief. Please do not hesitate to call me with any questions.

Sincerely,

  
Kelly L. Faglioni  
Counsel for Verizon

KLF/ar

Enclosures

cc: Dorothy T. Attwood, Chief, Common Carrier Bureau (8 copies) (By Hand)  
Jeffery Dygert (w/o encl.) (by mail)  
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*With enclosures, via email UPS-Next Day:*

Jodie L. Kelley, counsel for WorldCom  
Kimberly Wild, counsel for WorldCom

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

DEC 11 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Petition of WorldCom, Inc. Pursuant )  
to Section 252(e)(5) of the )  
Communications Act for Expedited )  
Preemption of the Jurisdiction of the )  
Virginia State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon Virginia Inc., and for )  
Expedited Arbitration )

CC Docket No. 00-218

In the Matter of )  
Petition of Cox Virginia Telecom, Inc. )  
Pursuant to Section 252(e)(5) of the )  
Communications Act for Preemption )  
of the Jurisdiction of the Virginia State )  
Corporation Commission Regarding )  
Interconnection Disputes with Verizon )  
Virginia Inc. and for Arbitration )

CC Docket No. 00-249

In the Matter of )  
Petition of AT&T Communications of )  
Virginia Inc., Pursuant to Section 252(e)(5) )  
of the Communications Act for Preemption )  
of the Jurisdiction of the Virginia )  
Corporation Commission Regarding )  
Interconnection Disputes With Verizon )  
Virginia Inc. )

CC Docket No. 00-251

**VERIZON VA'S POST-HEARING REPLY BRIEF  
(CATEGORIES I AND III THROUGH VII)**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Interconnection Disputes With Verizon	)	
<u>Virginia Inc.</u>	)	

**VERIZON'S POST-HEARING REPLY BRIEF ON NON-COST ISSUES**  
(CATEGORIES I AND III THROUGH VII)

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Verizon VA's proposals for line sharing and line splitting, which are the same as Verizon offerings in other states that, as the Commission has found, comply fully with the requirements of the law.

Elsewhere the Petitioners propose to insert provisions that "paraphrase" the law, rather than reference the actual language of the law. This is simply a surreptitious way to implement a law more to their liking and to give them contractual rights they hope would survive changes in the law. Moreover, their proposals would deprive the interconnection agreements of the flexibility necessary to keep pace with changes in the law and technology.

Finally, the Petitioners propose a plan by which they may misuse telephone numbers to make toll calls look like local calls and then contend that they are entitled to **receive** reciprocal compensation for terminating these calls instead of **paying** Verizon VA for the substantial costs it incurs to transport the calls on their behalf. This is yet another scheme designed to generate inappropriate reciprocal compensation revenue for CLECs that the Commission should reject. In addition, they make another proposal that would, with the stroke of a pen, eliminate their obligation to pay access charges on all intraLATA toll calls.

In addition to applying the existing state of the law, the Commission should continue to rely on industry collaboratives or generic proceedings that exist to resolve the competing interests of all CLECs that seek access to Verizon VA's network, services, and systems. The Commission should ensure that the interconnection agreements that result from this arbitration incorporate the agreements reached in the industry collaboratives or the results of generic proceedings rather than conflict with them.

At the beginning of their briefs, the Petitioners claim that they want "access to all the

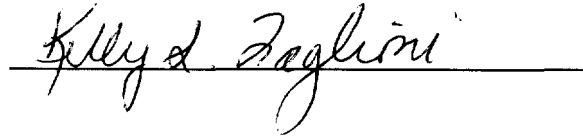
benefits the law provides” (*e.g.*, WorldCom Br. at 1.). Verizon’s proposals would give them that, and more. As noted, however, they actually demand benefits that go well beyond what the law provides and to which they are not entitled. Moreover, these broader demands would both increase their reliance on Verizon’s network beyond anything contemplated by Congress and force Verizon to absorb the costs that they impose, all to the detriment of Verizon and other facilities-based providers who they seek to undercut. Rather than promoting competition, therefore, acceding to their misplaced demands would undermine the ultimate objective of promoting efficient facilities-based competition. As Chairman Powell observed, “other methods of entry are useful interim steps to competing for local service, but Commission policy should provide incentives for competitors to ultimately offer more of their own facilities. This would decrease reliance on incumbent networks, provide the means for truly differentiated choice for consumers, and provide the nation with redundant communications infrastructure.”<sup>1</sup>

In sum, in contrast to the Petitioners’ over-reaching proposals, Verizon’s proposals are consistent with the Act and the Commission’s rules and should be adopted.

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<sup>1</sup> Remarks of Michael K. Powell (as prepared for delivery at p. 4) for October 23, 2001 Press Conference “Digital Broadband Migration,” Part II.

Respectfully submitted,

A handwritten signature in cursive script, reading "Kelly L. Faglioni", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Post-Hearing Reply Brief was sent as follows this

11<sup>th</sup> day of December, 2001 by e-mail and overnight, express delivery:

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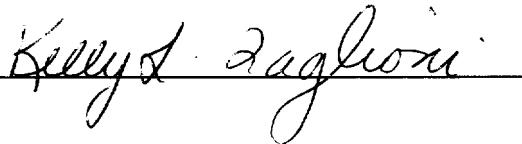
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## INTRODUCTION

At the very outset of this proceeding, Arbitrator Attwood admonished the parties that “this isn’t going to be the forum for the Commission to reconsider existing law. ... We will look at the existing state of the law and apply that state of the law.” Tr. 13. The proposals of Verizon Virginia Inc. (“Verizon VA”) comply with that law. Indeed, Verizon VA’s proposals mirror those of its affiliates in other jurisdictions where the Commission has found, in the context of § 271 proceedings, that they comply fully with the Telecommunications Act of 1996 (the “Act”) and the Commission’s rules. The Petitioners, however, have largely ignored Arbitrator Attwood’s admonition. Their proposals repeatedly seek something **more** than law provides, or something **different**.

To cite just a few examples, the Petitioners propose to require Verizon VA to combine network elements that are not in fact combined, even though both the Eighth Circuit and the Commission have rejected that requirement. In the guise of “**implementing**” the Commission’s *ISP Remand Order*, they propose to **rewrite** it, modifying provisions they do not like and adding others not found in the order. They refuse to be responsible for the costs of choosing a technically feasible but expensive interconnection, even though both the Commission and the Third Circuit have said that is what the law requires. In a number of proposals, the Petitioners demand that Verizon VA build facilities for their benefit, as well as pay for them, thus ignoring the holding of the Eighth Circuit that they are only entitled to access to Verizon VA’s existing network, not to a yet unbuilt superior one. They continue to demand that Verizon VA be required to provide DSL for resale over unbundled loop facilities even though the Commission has expressly declined to impose such a requirement on several prior occasions. And they reject



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## INDEX TO SHORT CITATIONS

(Federal Statutes, FCC Orders, Federal Cases, State Commission Orders)

<b>Federal Statutes</b>	
Short Citation	Full Citation
Act	<i>Telecommunications Act of 1996</i> , 47 U.S.C. § 151, <i>et seq.</i>
<b>FCC Orders</b>	
Short Citation	Full Citation
Access Charge NPRM	<i>In re Access Charge Reform Price Cap Performance Review for Local Exchange Carriers</i> , Notice of Proposed Rulemaking, Third Report and Order and Notice of Inquiry, 11 F.C.C.R. 21354 (1996).
Access Charge Order	<i>In re Access Charge Reform</i> , First Report and Order, 12 F.C.C.R. 15982 (1997).
Advanced Services Order	<i>In Re Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 F.C.C.R. 24011 (1998).
Advanced Services Order II	<i>In re Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , First Report and Order and Further Notice of Proposed Rulemaking, 14 F.C.C.R. 4761 (1999).
Advanced Services Order III	<i>In re Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , CC Docket No. 98-147 and <i>In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996</i> , CC Docket No. 96-98, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, 15 F.C.C.R. 17806 (2000).
Advanced Services Second R&O	<i>In re Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , CC Docket No. 98-147, Second Report and Order, 14 F.C.C.R. 19237 (1999).
BA/NYNEX Merger Order	<i>In re NYNEX Corp. and Bell Atlantic Corp. for Consent to Transfer Control of NYNEX Corp. and its Subsidiaries</i> , Memorandum Opinion and Order, 12 F.C.C.R. 19985 (1997).
BA/GTE Merger Order	<i>In re Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License</i> , Memorandum Opinion and Order, 15 F.C.C.R. 14032 (2000).
Collocation Remand Order	<i>In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , CC Docket 98-

	147, FCC 01-204, Fourth Report and Order (rel. Aug. 8, 2001).
CT Verizon § 271 Order	<i>In the Matter of Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Connecticut</i> , CC Docket No. 01-100, Memorandum Opinion and Order (2001).
Directory Listing Order	<i>In the Matters of Implementation of the Telecommunications Act of 1996, Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Provision of Directory Listing Information</i> , Third Report and Order in CC Docket no. 96-115, Second Order on Reconsideration in CC Docket No. 96-98, and Notice of Proposed Rulemaking in CC Docket No. 99-273 (rel. Sept. 9, 1999).
Fourth FNPRM	<i>Implementation of Local Competition Provisions of the Telecommunications Act of 1996</i> , CC Docket No. 96-98, Third Report and Fourth Further Notice of Proposed Rulemaking, 15 FCC Rcd 3696 (1999).
Global NAPs I	<i>Bell-Atlantic Delaware, Inc. v. Global NAPs, Inc.</i> , FCC Rcd. 12,946 (rel. Dec. 2, 1999), <i>aff'd on reconsideration</i> , 15 FCC Rcd. 5997 (rel. March 22, 2000).
Intercarrier Compensation NPRM	<i>In the Matter of Developing a Unified Intercarrier Compensation Regime</i> , CC Docket No. 01-92, FCC No. 01-132, Notice of Proposed Rulemaking (rel. April 27, 2001).
ISP Remand Order	<i>In the Matter of the Local Competition Provisions in the Telecommunication Act of 1996; Intercarrier Compensation for ISP-Bound Traffic</i> , CC Docket Nos. 96-98, 99-68, FCC No. 01-131 (rel. April 27, 2001).
Line Sharing Order	<i>In re Deployment of Wireline Services Offering Advanced Telecommunications Capability</i> , CC Docket No. 98-147 and <i>In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996</i> , CC Docket No. 96-98, Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in Docket No. 96-98, 14 F.C.C.R. 20912 (1999).



Line Sharing Reconsideration Order (2001)	<i>In re Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, and In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 97-98, Third Report and Order On Reconsideration In CC Docket No. 98-147, Fourth Report and Order On Reconsideration In CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, and Sixth Further Notice of Rulemaking in CC Docket No. 96-98, FCC 01-26 (rel. Jan. 19, 2001).</i>
Local Competition Order	<i>In re Implementation of the Local Competition Provision in the Telecommunications Act of 1996, First Report and Order, 11 F.C.C.R. 15499 (1996).</i>
MA Verizon § 271 Order	<i>In the Matter of Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 01-9, Memorandum and Order, FCC 01-130 (rel. April 16, 2001).</i>
NY Verizon § 271 Order	<i>In re Bell Atlantic-New York Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York, Consent Decree, 15 F.C.C.R. 5413 (2000).</i>
PA Verizon § 271 Order	<i>In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania, Memorandum Opinion and Order, CC Docket No. 01-128, FCC 01-269 (rel. Sept. 19, 2001).</i>
Reciprocal Compensation Order	<i>In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Inter-Carrier Compensation of ISP-Bound Traffic, Declaratory Ruling in CC Docket No. 96-98 and Notice of Proposed Rulemaking in CC Docket No. 99-68, 14 F.C.C.R. 3689 (1999), vacated, Bell Atlantic Tel. Co. v. FCC, 206 F.3d 1 (D.C. Cir. 2000).</i>
SBC Texas § 271 Order	<i>In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, Memorandum Opinion and Order, CC Docket. No. 00-65, FCC 00-238 (rel. June 30, 2000).</i>
Seventh Report	<i>In the Matter of Access Charge; Reform of Access Charge Imposed by Competitive Local Exchange Carriers, CC Docket No. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking (rel. April 27, 2001).</i>

Supplemental Order	<i>In re Implementation of the Local Competition Provisions of The Telecommunications Act of 1996</i> , CC Docket No. 96-98, Supplemental Order, 15 F.C.C.R. 1760 (1999).
Supplemental Order Clarification	<i>In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996</i> , Supplemental Order Clarification, 15 F.C.C.R. 9587 (2000).
TSR Wireless Order	<i>In re TSR Wireless, LLC, et al. v. U S WEST Communications, Inc. et al.</i> , Memorandum Opinion and Order, 15 F.C.C.R. 11166 (2000).
TX SBC § 271 order	<i>In re Application by SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas</i> , Memorandum Opinion and Order, 15 F.C.C.R. 18354 (2000).
UNE Licensing Order	<i>In re Petition of MCI for Declaratory Ruling that New Entrants Need not Obtain Separate License or Right-to-Use Agreements before Purchasing Unbundled Elements</i> , Memorandum Opinion and Order, 15 F.C.C.R. 13896 (2000).
UNE Remand Order	<i>In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996</i> , Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 15 F.C.C.R. 3696 (1999).
VA (Verizon/AT&T) Arbitration	<i>In the Matter of Petition of AT&amp;T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996</i> , CC Docket No. 00-251, Memorandum Opinion and Order (January 26, 2001).
VA (Verizon/Cox) Arbitration Order	<i>In the Matter of Petition of Cox Virginia Telecom, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996</i> , CC Docket No. 00-249, Memorandum Opinion and Order (January 26, 2001).
VA (Verizon/WorldCom) Arbitration Order	<i>In the Matter of Petition of WorldCom, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996</i> , CC Docket No. 00-218, Memorandum Opinion and Order (Jan. 26, 2001).
<b>Federal Cases</b>	
Short Citation	Full Citation
Bell Atlantic	<i>Bell Atlantic Telephone Companies v. FCC</i> , 206 F.3d (1)(D.C. Cir. 2000).
Iowa Utilities I	<i>Iowa Utilities Board v. FCC</i> , 120 F.3d 753 (8 <sup>th</sup> Cir. 1997).
Iowa Utilities II	<i>Iowa Utilities Board v. FCC</i> , 219 F.3d 744 (8 <sup>th</sup> Cir. 2000).

MCI Telecommunications Corp.	<i>MCI Telecommunications Corp. v. Bell Atlantic Pennsylvania</i> , Nos. 00-2257 and 00-2258, 2001 U.S. App. WL 1381590 (3 <sup>rd</sup> Cir. Nov. 2, 2001).
<b>State Commission Orders</b>	
Short Citation	Full Citation
CT Arbitration Order	<i>DPUC Investigation of the Payment of Mutual Compensation for Local Calls Carried Over Foreign Exchange Service Facilities</i> , Docket No. 01-01-29, Connecticut DPUC (rel. March 19, 2001).
FL (AT&T/BellSouth) Arbitration Order	<i>In re: Petition by AT&amp;T Communications of the Southern States, Inc. d/b/a AT&amp;T for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. pursuant to 47 U.S.C. Section 252</i> , Docket No. 000731-TP, Final Order on Arbitration (Order No. PSC-01-1402-FOF-TP, issued June 28, 2001).
GA Arbitration Order	<i>In re: Generic Proceeding on Point of Interconnection and Virtual FX Issues</i> , Georgia Public Service Commission, Docket No. 13542-U (rel. July 23, 2001).
IN (AT&T/Ameritech) Arbitration Order	<i>AT&amp;T Communications of Indiana TCG Indianapolis, Petition for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana Pursuant to Section 252(b) of the Telecommunications Act of 1996</i> , Cause No. 40571-INT-03 (Nov. 20, 2000).
KY (Sprint/BellSouth) Arbitration Order	<i>In the Matter of Sprint Communications Company, L.P. for Arbitration with BellSouth Telecommunications Inc., Pursuant to Section 252(b) of the Telecommunications Act of 1996</i> , Order in Case No. 2000-480, Public Service Com'n of Kentucky (June 13, 2001).
MA (MediaOne/Bell Atlantic) Arbitration Order	<i>Petitions of MediaOne Telecommunications of Massachusetts, Inc. and New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts for Arbitration, Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement and Petition of Greater Media Telephone, Inc. for Arbitration, Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts</i> , Massachusetts Department of Telecommunications and Energy, D.T.E. 99-42/43, 99-52 (August 25, 1999).
MA (Sprint/Verizon) Arbitration Order	<i>Petition of Sprint Communications Company L.P., Pursuant to Section 252(b) of the Telecommunications Act of 1996</i> ,

	<i>For Arbitration of an Interconnection Agreement Between Sprint and Verizon-Massachusetts, D.T.E. 00-54, Decision (rel. Dec. 11, 2000).</i>
MD (Sprint/Verizon) Arbitration Order	<i>In the Matter of the Arbitration of Sprint Communications Company, L.P. vs. Verizon Maryland Inc., Pursuant to Section 252(b) of the Telecommunications Act of 1996, Order No. 77320, Case No. 8887 (rel. October 24, 2001).</i>
ME (Brooks/Verizon) Arbitration Order	<i>Investigation Into Use of Central Office Codes (NXXs) by New England Fiber Communications, Inc., LLC d/b/a/ Brooks Fiber, Docket No. 98-78, Maine PUC (rel. June 30, 2000).</i>
MO (AT&T/SBC) Arbitration Order	<i>Application of AT&amp;T Communications of the Southwest, Inc., TCG St. Louis, Inc., and TCG Kansas City, Inc. for Arbitration of Unresolved Interconnection Issues with Southwestern Bell Company, Missouri Public Service Commission, Arbitration Order (rel. June 14, 2001).</i>
NC (AT&T/BellSouth) Arbitration Order	<i>In the Matter of Arbitration of Interconnection Agreement Between AT&amp;T Communications of the Southern States, Inc., and TCG of the Carolinas, Inc., and BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996, Docket Nos. P-140, Sub 73, P-646, Sub 7 (March 9, 2001).</i>
NY (AT&T/Verizon) Arbitration Order	<i>Joint Petition of AT&amp;T Communications of New York, Inc., TCG New York Inc. and ACC Telecom Corp. Pursuant to Section 252(b) of the Telecommunications Act of 1996 for Arbitration to Establish an Interconnection Agreement with Verizon New York Inc., Case No. 01-C-0095, Order Resolving Arbitration Issues (rel. July 30, 2001).</i>
NY DSL Reconsideration Order	<i>In re Digital Subscriber Line Services, Order Granting Clarification, Granting Reconsideration In Part and Denying Reconsideration in Part, and Adopting Schedule, Case No. 00-C-0127, 2001 WL 322813 (N.Y.P.S.C. Jan. 29, 2001).</i>
NY PSC Local Traffic Order	<i>Proceeding on Motion of the Commission Pursuant to Section 97(2) of the Public Service Law to Institute an Omnibus Proceeding to Investigate the Interconnection Arrangements Between Telephone Companies, Case No. 00-C-0789, Order Establishing Requirements for the Exchange of Local Traffic, at 7 (Dec. 22, 2000).</i>
Pacific Bell Opinion	<i>Application by AT&amp;T Communications of California, Inc., et al. (U 5002 C) for Arbitration of an Interconnection Agreement with Pacific Bell Telephone Company (U 1001 C) Pursuant to Section 252(b) of the Telecommunications Act of 1996, Decision No. 00-08-011 (rel. Aug. 3, 2000).</i>
PA (Sprint/Verizon) Arbitration	<i>Petition of Sprint Communication Company, L.P. for an Arbitration Award of Interconnection Rates, Terms and Conditions Pursuant to 47 U.S.C. § 252(b) and Related</i>

	<i>Arrangements With Verizon Pennsylvania, Inc.</i> , Opinion and Order, A-310183F002 (rel. October 14, 2001).
SC (AT&T/BellSouth) Arbitration Order	<i>In re Petition of AT&amp;T Communications of the Southern States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252</i> , Docket No. 2000-527C, Order No. 2001-079, (Jan. 30, 2001).
TX Recip. Comp. Order	<i>Proceeding to Examine Reciprocal Compensation Pursuant to Section 252 of the Federal Telecommunications Act of 1996</i> , Arbitration Award, Texas Public Utilities Commission, Docket No. 21982 (rel. July 13, 2000).
VA Collocation Order	<i>Application of Verizon Virginia, Inc. f/k/a Bell Atlantic-Virginia, Inc., for Approval of its Network Services Interconnection Tariffs</i> , SCC-Va-218, Order, Case No. PUC990101 (rel. Oct. 12, 2001).